

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT OF
FOR THE WESTERN DISTRICT OF OKLAHOMA

SEAN SMITH and CRYSTAL)	
SMITH,)	
)	
Plaintiffs,)	
VS.)	Case No. 5:17-cv-1302D
)	
CSAA FIRE & CASUALTY)	
INSURANCE COMPANY,)	
)	
Defendant.)	

DEPOSITION OF CHAD WHITE HECKMAN
TAKEN ON BEHALF OF THE PLAINTIFF
IN OKLAHOMA CITY, OKLAHOMA
ON OCTOBER 23, 2018

REPORTED BY: SUSAN J. FENIMORE, CSR, RPR

1 before?

2 A I don't believe so.

3 Q You know, it's -- how did you get the name
4 Rimkus Engineering then?

5 A In the senior position we had a list of
6 different companies and we had their names and then
7 notches there, so if they were used, then we'd go to
8 the next one. And we just kept doing that to keep
9 using different companies and experts, as long as
10 they were available or in that state. Because some
11 states, if they were next in line, they might not be
12 in that state, so then we'd maybe have to skip them.
13 But we would try to move it, you know, continuously
14 changing.

15 Q Where is this list at? Is it like on a dry
16 erase board somewhere?

17 A Yeah, it was just a piece of paper that
18 just the senior -- because the senior adjusters sat
19 together, so it was a little list that they kept for
20 each other just to make sure we're going through in
21 different experts or people that we're using.

22 Q How many names were on the list?

23 A I know that there were four. I can't
24 remember two of the names. I know that Rimkus was on
25 there and Donan, but I don't know the other two. I